

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

THIS DOCUMENT RELATES TO:

CHARLES RAY EASTERLING and his
wife, MARY ANN EASTERLING, et al.,

Plaintiffs,

v.

NATIONAL FOOTBALL LEAGUE, INC.,

Defendant.

MDL No. 2323
No. 12-md-2323-AB

CIVIL ACTION
Case No. 11-CV-05209-AB

DECLARATION OF DENNIS L. CURRAN

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CHARLES RAY EASTERLING and his
wife, MARY ANN EASTERLING, et al.,

Plaintiffs,

v.

NATIONAL FOOTBALL LEAGUE,
INC.,

Defendant.

CIVIL ACTION

Case No. 11-CV-05209-AB

DECLARATION OF DENNIS L. CURRAN

DENNIS L. CURRAN, being duly sworn, deposes and says:

1. I am a Senior Vice President of the National Football League ("NFL") and General Counsel of the National Football League Management Council ("NFLMC"). The NFLMC is the sole and exclusive bargaining representative of the 32 member Clubs of the NFL. I have been the General Counsel of the NFLMC since 1990. I make this affidavit, on personal knowledge, in support of the NFL's Motion to Dismiss the Amended Complaint.

2. Attached as Exhibit 1 is a true and correct copy of the published version of the 1968 Collective Bargaining Agreement ("CBA") between the American Football League Player Relations Committee and the American Football League Players Association effective July 10, 1968.

3. Attached as Exhibit 2 is a true and correct copy of the published version of the 1968 CBA between the NFL and the National Football League Players' Association ("NFLPA") effective July 15, 1968.

4. Attached as Exhibit 3 is a true and correct copy of the published version of the 1970 CBA between the NFLMC and the NFLPA effective February 1, 1970.

5. Attached as Exhibit 4 is a true and correct copy of the published version of the 1977 CBA between the NFLMC and the NFLPA effective February 1, 1974.

6. Attached as Exhibit 5 is a true and correct copy of the published version of the 1982 CBA between the NFLMC and the NFLPA effective July 16, 1982.

7. Attached as Exhibit 6 is a true and correct copy of the published version of the 1993 CBA between the NFLMC and the NFLPA dated March 29, 1993.

8. Attached as Exhibit 7 is a true and correct copy of the published version of the 1993 CBA between the NFLMC and the NFLPA as amended June 6, 1996.

9. Attached as Exhibit 8 is a true and correct copy of the published version of the 1993 CBA between the NFLMC and the NFLPA as amended February 25, 1998.

10. Attached as Exhibit 9 is a true and correct copy of the published version of the 1993 CBA between the NFLMC and the NFLPA as amended January 8, 2002.

11. Attached as Exhibit 10 is a true and correct copy of the published version of the 2006 CBA between the NFLMC and the NFLPA dated March 8, 2006.

12. Attached as Exhibit 11 is a true and correct copy of the published version of the 1969 Constitution and Bylaws of the NFL and the American Football League.

13. Attached as Exhibit 12 is a true and correct copy of the published version of the 1971 Constitution and Bylaws of the NFL.

14. Attached as Exhibit 13 is a true and correct copy of the published version of the 1972 Constitution and Bylaws of the NFL.

15. Attached as Exhibit 14 is a true and correct copy of the published version of the 1973 Constitution and Bylaws of the NFL.

16. Attached as Exhibit 15 is a true and correct copy of the published version of the 1974 Constitution and Bylaws of the NFL.

17. Attached as Exhibit 16 is a true and correct copy of the published version of the 1975 Constitution and Bylaws of the NFL.

18. Attached as Exhibit 17 is a true and correct copy of the published version of the 1976 Constitution and Bylaws of the NFL.

19. Attached as Exhibit 18 is a true and correct copy of the published version of the 1977 and 1978 amendments to the Constitution and Bylaws of the NFL.

20. Attached as Exhibit 19 is a true and correct copy of the published version of the 1979 Supplement to the Constitution and Bylaws of the NFL.

21. Attached as Exhibit 20 is a true and correct copy of the published version of the 1980 Supplement to the Constitution and Bylaws of the NFL.

22. Attached as Exhibit 21 is a true and correct copy of the published version of the 1981 Supplement to the Constitution and Bylaws of the NFL.

23. Attached as Exhibit 22 is a true and correct copy of the published version of the 1982 Supplement to the Constitution and Bylaws of the NFL.

24. Attached as Exhibit 23 is a true and correct copy of the published version of the 1984 Constitution and Bylaws of the NFL.

25. Attached as Exhibit 24 is a true and correct copy of the published version of the 1985 Constitution and Bylaws of the NFL.

26. Attached as Exhibit 25 is a true and correct copy of the published version of the 1988 Constitution and Bylaws of the NFL.

27. Attached as Exhibit 26 is a true and correct copy of the published version of the 1999 Constitution and Bylaws of the NFL.

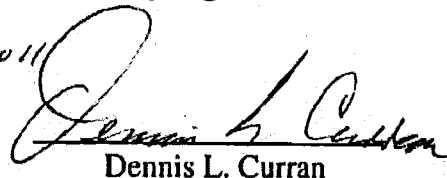
28. Attached as Exhibit 27 is a true and correct copy of the published version of the 2004 Constitution and Bylaws of the NFL.

29. Attached as Exhibit 28 is a true and correct copy of the published version of the 2006 Constitution and Bylaws of the NFL.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

November 8, 2011

A handwritten signature in dark ink, appearing to read "Dennis L. Curran", is written over a horizontal line.

Dennis L. Curran